REMARKS

Reconsideration and allowance of this subject application are respectfully requested.

In this fourth action, the Examiner withdraws the previous grounds of rejection and makes another obviousness type rejection of all claims. Specifically, claims 1-15 stand rejected under 35 U.S.C. §103 as being unpatentable over newly-cited applied Selgas et al. (2004/0030752) in view of Modarressi et al. (U.S. Patent No. 6,667,971). This rejection is respectfully traversed.

The Examiner rejects the independent claims 1, 6 and 11 alleging that Selgas teaches communication between a general packet radio service system (GPRS) and a RADIUS server, making reference to an IP network in Figure 2. Claim 11 recites a communication between a packet *radio* server and a RADIUS server. Figure 1 simply shows internet service providers 102 coupled to the Internet 100. There is no mention in the referenced text of Selgas of a General Packet Radio Service (GPRS) system or of a packet radio server. There is no description of radio communications. Instead, it is assumed that the user makes a wired connection with an underlying network access provider, e.g., by using a modem or a LAN Ethernet connection. If the Examiner elects to maintain this rejection, Applicant respectfully requests that the Examiner specifically identify where a packet radio server, GPRS System, and radio communications are specifically described in Selgas.

The Examiner also contends that Selgas describes identifying the external network with an access point name. The paragraphs in Selgas referred to by the Examiner, i.e., paragraphs 59, 61, 62, and 71, refer to providing the user with a Password Authentication Protocol (PAP) identification number and a password associated with an Internet service provider. Is the

Examiner contending that Selgas' authentication ID number or password is an access point name? Please advise.

Assuming the Examiner is reading the claimed external network on the internet in Selgas, is the Examiner also reading the GPRS system of claims 1 and 6 and the packet radio server of claim 11 on the ISP 102? Reviewing paragraph 71 of Selgas suggests that the Examiner is reading the external network on the ISP 102-- is this the case? If so, please identify what node in Selgas corresponds to the claimed GPRS node/packet radio node. Even with either assumption, paragraph 71 of Selgas lists the access information for each ISP dialing number, and none of that access information includes an <u>access point name</u> distinguishable from identification numbers, passwords, and gateway address information.

The Examiner further alleges that Selgas discloses passing an APN external network authentication request to a RADIUS server making reference to paragraph 106. This paragraph relates to a client dispatch application 200 transmitting header information to an access server 106. There is no reference to the access server 106 by the Examiner with respect to the elements of the independent claims described above. Thus, it is not clear what claim element reads on the access server 106. Please advise.

There is no teaching in paragraph 106 that the access server 106 functions as a RADIUS server or that it receives an authentication request from an external network (the header information comes from the user's dispatch application 200) or that access server 106 provides "a subscriber IP address associated with the APN external network." Instead, paragraph 106 explains that "the access server 106 determines whether a user 110 is making two connections while only paying for one and thus needs to be disconnected, or is a user 110 that needs a database or file update." Thus, paragraph 106 is clearly not relevant.

The Examiner's also refers to Selgas paragraph 111. But this text describes examining the user's operating system files to determine if networking options have been installed and configured properly. If not, the user's workstation is configured so that the TCP/IP protocol can be used. It is not seen how this general configuration of a user terminal to support a network communication with the Internet 100 using TCP/IP discloses providing from a RADIUS server, a subscriber IP address associated with the claimed APN external network. Clarification is requested.

The Examine admits that Selgas fails "to teach an inventive concept of using the GTSN for combining the APN gateway address and the subscriber IP address to form a unique subscriber identifier." Applicants agree. In addition, Selgas fails to disclose the additional claim feature of sending that unique subscriber identifier to the RADIUS server, as recited in each independent claim.

The Examiner relies on Modarressi as allegedly teaching the "inventive concept" that Selgas does not teach. Here the Examiner refers to the abstract of Modarressi and column 9, lines 21-40. Modarressi describes an enhanced Asymmetric Digital Subscriber Loop (ADSL) architecture. The abstract describes establishing a continuous logical connection between a subscriber computer and a continuous server provider as well as establishing a temporary logical connection between the user computer and a temporary service provider. But this has nothing to do with combining an APN gateway address and a subscriber IP address to form a unique subscriber identifier.

The text in column 9 refers to the user's computer 102b, as shown in Figure 3a (which includes the communications portal 330 referred to in this text), combining the continuous service provider 302 gateway IP address information with a "subnetwork address of the service

cluster 303 to create a static route in routing table 332." Column 9, lines 25-28. The routing

table 332 is also located in the user computer, as shown in Figure 3a. The service cluster 303 is

located in the continuous server provider 302 (See Fig. 3a). Claim 1 recites that the GGSN is the

entity that combines the APN gateway address and the subscriber IP address to form a unique

subscriber identifier. This is completely different from what's described in column 9 by

Modarressi. It is the user terminal that is doing the combining, (not a GGSN), and the things

being combined correspond to address information for the continuous server provider 302 –not

the user or user terminal. There is no teaching of combining any gateway address with a

"subscriber IP address." Nor is anything that's combined by Modarressi "a unique subscriber

identifier," as recited in the claims. To the contrary, what results from the user terminal

combination is a static route to be stored in its routing table 332 for routing packets to the

continuous server provider 302. In other words, the combined identifier in Modarressi identifies

the continuous server provider and not the subscriber or the user computer.

Thus, even if the Examiner's combination of Modarressi and Selgas were accepted, for

purposes of argument only, that combination fails to disclose many features recited in each of the

independent claims. Nor is there any motivation to combine Modarressi with Selgas for the

reasons propounded by the Examiner because those reasons are simply not accurate. There is no

teaching of accounting in either Modarressi or Selgas. The Examiner creates that hindsight

motivation after having read the instant application.

Applicant is uncertain as to what specific elements read on the specific features of the

dependent claims. The Examiner rejects those claims making general reference to figures and

paragraphs without identifying what the specific elements recited in each of the dependent

claims correspond to. If any claims are to be rejected in the next office action, Applicant

respectfully requests that the Examiner specifically identify for each claimed feature, the specific

element that that claimed feature is being read on in the applied prior art reference <u>identified by</u>

<u>name and by reference numeral</u>.

The application is condition for allowance. An early notice to that effect is earnestly

solicited.

Respectfully submitted,

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